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IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF IDAHO

In Re:) Chapter 7
) Case No. 99-01868
Francisco Maciel Castellanos, Jr.)
aka Frank M. Castellanos Jr.)
) **AFFIDAVIT OF RICHARD H. GREENER**
) **IN SUPPORT OF APPLICATION TO**
) **EMPLOY ATTORNEYS AS SPECIAL**
Debtor.) **COUNSEL AND RETROACTIVE TO**
) **THE DATE OF PETITION**

STATE OF IDAHO)
) ss
County of Ada)

RICHARD H. GREENER, being first duly sworn upon oath, deposes and says:

1. I am an attorney at law, duly admitted to practice in the state of Idaho and in this Court, and am with the firm of Cosho, Humphrey, Greener & Welsh, P.A.
2. I maintain an office for the practice of law at 815 West Washington, Boise, Ada County, Idaho.
3. I have no connection with the above named Debtor, his creditors, or any other party in interest herein, or their respective attorneys, except that I represent the Debtor in a proceeding filed against State Farm Insurance Company.
4. Other than as disclosed herein I represent no interest adverse to the above named Debtor estate in the matters upon which I am to be engaged.

**AFFIDAVIT OF RICHARD GREENER IN SUPPORT OF APPLICATION
TO EMPLOY ATTORNEY AS SPECIAL COUNSEL FOR DEBTOR, Page 1**

C:\temp\EMPLOY.AFF.spec.doc November 18, 1999

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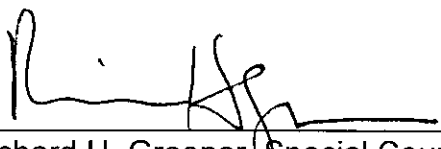
5. This firm along with the Goicoechea Law Offices agreed to represent the Debtor prior to the Bankruptcy being filed based on an agreement to receive reimbursement of all costs and attorneys fees based on 33 1/3 of any recovery in the litigation against State Farm Insurance Company. We have agreed to continue this fee arrangement with the Estate how that the bankruptcy has been filed.

6. The Debtor did not inform me that he had filed for protection under chapter 7 in July 1999. I only recently was informed of this filing. I did not receive notice of the Bankruptcy in the mail.

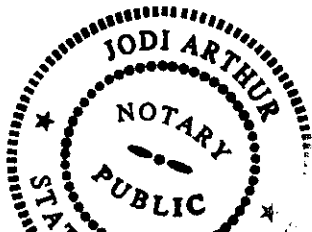
7. I have reviewed the accumulated time and costs prior to July 21, 1999 and after that period. The costs and fees incurred since July when we represented the Debtor being ignorant of the Bankruptcy, this represented less than ten percent of the total fees and costs incurred in the proceeding. A substantial amount of time and costs were incurred in discovery prior to the July petition date.

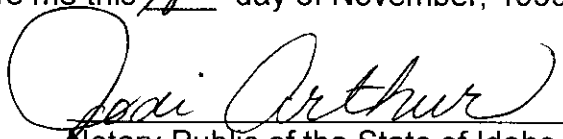
My firm and the Goicoechea Law Offices have agreed to represent the Estate as special counsel in the State Farm Litigation.

DATED this 18th day of November, 1999.


Richard H. Greener, Special Counsel

SUBSCRIBED AND SWORN to before me this 18th day of November, 1999.




Notary Public of the State of Idaho
Residing at Edge, Idaho
My Commission Expires 9/13/2001

**AFFIDAVIT OF RICHARD GREENER IN SUPPORT OF APPLICATION
TO EMPLOY ATTORNEY AS SPECIAL COUNSEL FOR DEBTOR, Page 2**